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J. T. Beckham, Jr. Vice President and General Manager Nuclear Operations Georgia Power

April 15, 1986

SL-580 0467C

Director of Nuclear Reactor Regulation Attention: Mr. D. Muller, Project Director BWR Project Directorate No. 2 Division of Boiling Water Reactor Licensing U. S. Nuclear Regulatory Commission Washington, D. C. 20555

### NRC DOCKET 50-321 OPERATING LICENSE DPR-57 EDWIN I. HATCH NUCLEAR PLANT UNIT 1 REQUEST TO REVISE PRIMARY CONTAINMENT VALVE LISTING TECHNICAL SPECIFICATIONS

#### Gentlemen:

In accordance with the provisions of 10 CFR 50.90 as required by 10 CFR 50.59(c)(1), Georgia Power Company (GPC) hereby proposes changes to the Technical Specifications, Appendix A to Operating License DPR-57.

The proposed changes would update valve listings contained in Table 3.7-1, "Primary Containment Isolation Valves," and Table 3.7-4, "Primary Containment Testable Isolation Valves." The requested changes fall into several areas: Wording associated with the tables has been clarified to reflect the tables' intent. Primary containment isolation valves added to the plant as a result of modifications are proposed for addition to the tables. Valves which have been modified so that they do not perform a containment isolation function are deleted from Table 3.7-4. Valves which have been incorrectly listed as containment isolation valves are removed from Table 3.7-4. Incorrect descriptive information appearing in tables 3.7-1 and 3.7-4 has been corrected. Notes to the tables have been corrected, deleted, or added as appropriate.

Previous GPC submittals dated March 5, 1979, and March 3, 1986, proposed deletion of Tables 3.7-4 and 3.7-1, respectively. A comprehensive plant procedure has been developed to implement primary containment valve surveillance and control valve listings following removal of the listings from the Technical Specifications. We continue to believe that plant procedures provide the most appropriate vehicle for this type of information, and we request that NRC continue its review of the above submittals.

The Plant Review Board and the Safety Review Board Subcommittee have reviewed the proposed changes.

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# Georgia Power

Attention: Mr. D. Muller, Project Director BWR Project Directorate No. 2 Director of Nuclear Reactor Regulation April 15, 1986 Page Two

Enclosure 1 provides a detailed description of the proposed changes and bases for the changes.

Enclosure 2 details the basis for our determination that the proposed changes do not involve a significant hazards consideration.

Enclosure 3 provides page change instructions for incorporating the proposed changes into the Technical Specifications.

The proposed changed Technical Specifications pages follow Enclosure 3.

Payment of filing fee is enclosed.

In order to allow time for procedure revision and orderly incorporation into copies of the Technical Specifications, we request that the proposed amendment, once approved by the NRC, be issued with an effective date to be no later than 60 days from the issuance of the amendment.

Pursuant to the requirements of 10 CFR 50.91, Mr. J. L. Ledbetter of the Environmental Protection Division of the Georgia Department of Natural Resources will be sent a copy of this letter and all applicable enclosures.

Mr. J. T. Beckham, Jr. states that he is Vice President of Georgia Power Company and is authorized to execute this oath on behalf of Georgia Power Company, and that to the best of his knowledge and belief the facts set forth in the letter and enclosures are true.

GEORGIA POWER COMPANY

By: A.J. Seckham, Jr.

Sworn to and subscribed before me this 15th day of April, 1986.

Sendor R. Clants

My Commission Expires Dec. 12, 1989 REB/1c

Attachments

c: Mr. H. C. Nix, Jr. Senior Resident Inspector, Plant Hatch Dr. J. N. Grace Mr. J. L. Ledbetter GO-NORMS



#### ENCLOSURE 1

## NRC DOCKET 50-321 OPERATING LICENSE DPR-57 EDWIN I. HATCH NUCLEAR PLANT UNIT 1 REQUEST TO REVISE PRIMARY CONTAINMENT VALVE LISTING TECHNICAL SPECIFICATIONS BASIS FOR CHANGE REQUEST

Changes are proposed to clarify and correct Plant Hatch Unit 1 Technical Specifications associated with Operability and Surveillance requirements for Primary Containment Isolation Valves (PCIVs). The proposed changes cover two general areas: The first area involves clarifying changes to wording associated with the performance of PCIV surveillance. The second area involves additions, deletions, and corrections to valve listings and descriptive information contained in Tables 3.7-1 and 3.7-4. The proposed changes and associated justifications are described below.

#### Proposed Change 1:

It is proposed to change the title of Table 3.7-1, "Primary Containment Isolation Valves," to clarify its intent. The proposed new title is "Primary Containment Isolation Valves Which Receive a Primary Containment Isolation Signal." Table 3.7-1 is required for implementation of Technical Specification 4.7.D.1.a, which requires that "isolation valves that are power operated and automatically initiated...be tested for simulated automatic initiation and the closure times specified in Table 3.7-1." This requirement can only apply to power-operated PCIVs which receive a containment isolation signal. The present title implies that the table is a complete listing of automatic and non-automatic PCIVs. Table 3.7-4 provides a listing of all PCIVs, including those listed in Table 3.7-1.

This change provides clarification and does not affect probabilities or consequences of analyzed accidents or margins of safety. No new accident types are created.

#### Proposed Change 2:

The second proposed change would delete the reference to Table 3.7-1 from Technical Specification 3.7.D.1. This Specification presently requires that "...all primary containment isolation valves listed in Table 3.7-1...shall be operable..." Removal of the reference results in a requirement that all PCIVs (including those not listed in Table 3.7-1) shall be operable. As explained above, Table 3.7-1 merely provides a subset of PCIVs subject to additional surveillance requirements per Specification 4.7.D.1.a and is not intended to be a complete listing of all PCIVs.



## REQUEST TO REVISE PRIMARY CONTAINMENT VALVE LISTING TECHNICAL SPECIFICATIONS BASIS FOR CHANGE REQUEST

This conservative change represents an additional requirement and does not affect probabilities or consequences of analyzed accidents or margins of safety. No new accident types are created.

#### Proposed Change 3:

It is proposed to delete check valves from Table 3.7-1. Again, Table 3.7-1 is for surveillance of automatic PCIVs which receive a primary containment isolation signal. No automatic actuation, closure time, or any other surveillances are involved for the presently listed check valves; therefore, their appearance in Table 3.7-1 is superfluous.

This change provides clarification and does not affect probabilities or consequences of analyzed accidents or margins of safety. No new accident types are created.

#### Proposed Change 4:

Additional valves are proposed for inclusion in Table 3.7-1. These valves are added as a result of a comprehensive review of automatic PCIVs performed by GPC with assistance from the Architect/Engineer. Certain of these valves have been added to the plant due to design changes. Our review identified other valves which meet the criteria for inclusion in Table 3.7-1 but have not previously been listed in the table. These valves are now proposed for addition to the table. For the Hydrogen/Oxygen analyzer system, the previous single designation for the entire system has been replaced with a listing of all individual PCIVs and their normal and accident positions.

No valves are proposed for deletion by change number 4. Since all proposed changes represent additions to the table and additional Technical Specifications requirements, these changes are clearly conservative. Probabilities and consequences of analyzed accidents are not increased. Margins of safety are not decreased. No new accident types are created.

#### Proposed Change 5:

Changes are proposed for descriptive information associated with Table 3.7-1. Our review has identified inaccuracies in the "normal position" and "action on initiating signal" designations for several valves listed in



## REQUEST TO REVISE PRIMARY CONTAINMENT VALVE LISTING TECHNICAL SPECIFICATIONS BASIS FOR CHANGE REQUEST

the table. Changes are proposed to correct these. The proposed changes do not represent changes to PCIV operation or configuration, but correct the Technical Specifications to accurately reflect actual plant conditions. Under Specification 4.7.D.l.c(1), valves whose normal positions are changed from closed to open will require once per quarter cycling. Valves whose normal positions are changed from closed to open will be removed from the requirement for quarterly cycling. This change is appropriate, since the actual normal valve position is closed, and the accident position is closed. Additionally, certain signals initiating group isolations are added to the Notes for Table 3.7-1.

These changes correct errors or omissions in the current Technical Specifications and do not affect plant operation. These changes have no effect on probabilities or consequences of analyzed accidents or margins of safety. No new accident types are created.

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## Proposed Change 6:

Table 3.7-4, "Primary Containment Testable Isolation Valves," provides a listing of PCIVs subject to leak rate testing under the provisions of 10 CFR 50 Appendix J. A review of leak rate testing and Inservice Inspection procedures versus this table has been performed. To correct erroneous listings, additions and deletions to valve listings, as well as changes to descriptive information and notes pertaining to this table, are in order.

It is proposed to correct the valve listings for valves B21-F010A and B, B21-F019, B21-F020, B21-F031A and B, P33-F003, P33-F011, P33-F004, P33-F012, E11-F016B, P70-F002, and P70-F003. These valves have been listed beside the wrong penetration numbers. The proposed change would move the listings to the correct penetration numbers. Valve B21-F019 was incorrectly listed beside two penetration numbers. The incorrect listing would be deleted.

This proposed change corrects inaccurate information to correspond to actual plant conditions. No changes in plant operation are involved. This change does not increase probabilities or consequences of analyzed accidents. Margins of safety are not affected. No new accident types are created.

## Proposed Change 7:

Plant modifications underway in the current maintenance/refueling outage have resulted in changes to the Notes associated with Table 3.7-4. These modifications will correct previous problems associated with local leak rate



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testing of certain PCIVs in the direction opposite post accident flow. Because of the configuration of these valves within their respective systems, they could not be pressurized and tested in their isolation direction. Design modifications, including the installation of blocking valves and test connections between the affected valves and the penetration, will now allow these valves to be tested in the isolation direction. Therefore, the Notes for Table 3.7-4 corresponding to these valves have been changed to indicate the method of testing. The revised method of testing meets applicable criteria per 10 CFR 50 Appendix J.

This proposed change does not affect accident probabilities or consequences. Plant operation is not affected. The revised valve testing methods will more realistically model post accident conditions. Margins of safety are not affected. No new accident types are created.

#### Proposed Change 8:

It is proposed that 72 valves be added to Table 3.7-4. As stated above, GPC has performed a comprehensive review of leak rate testing requirements. This review has identified a large number of valves currently listed in plant leak rate test procedures which do not appear in Table 3.7-4. In some cases the valves have been added as a result of plant modifications. In other cases the valves have never appeared in the table even though they are leak rate tested.

Addition of the valves to the Technical Specifications is a conservative change to allow the Technical Specifications to reflect plant leak rate test procedures. No changes to plant operation are involved. Probabilities and consequences of analyzed accidents are not affected. Margins of safety are not affected. No new accident types are created.

#### Proposed Change 9

GPC's review of leak rate testing procedures and requirements has identified 26 valves presently listed in Table 3.7-4 which should not require leak rate testing. Valves so identified are proposed for deletion from Table 3.7-4. Each valve proposed for deletion, and its associated justification, follow:

Valve G31-F042 is located downstream of two leak rate tested PCIVs, B21-F010A (presently listed in Table 3.7-4) and G31-F039 (proposed for addition to "sble 3.7-4).

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#### REQUEST TO REVISE PRIMARY CONTAINMENT VALVE LISTING TECHNICAL SPECIFICATIONS BASIS FOR CHANGE REQUEST

Valve C11-F086 is a manual, normally open valve which serves no containment isolation function. This valve number was originally assigned to a PCIV. However, plant modifications have resulted in removal of the original valve and, subsequently, reassigned valve number C11-F086 to another valve which performs no containment isolation function.

Valve C11-F083 is located downstream of two leak rate tested PCIVs, B21-F010A (presently listed in Table 3.7-4) and G31-F039 (proposed for addition to Table 3.7-4).

Valves Ell-F021A and B do receive isolation signals; however, these valves are not considered the primary isolation boundary. Valves Ell-F019A and B and a closed system outside containment provide the correct isolation boundary. This is in agreement with the Inservice Inspection (ISI) plan.

Valves Ell-F065A, B, C, and D are normally open, fail open, maintenance isolation valves. Containment isolation for these penetrations (X-205A, B, C, D) is provided, respectively, by valves Ell-F030A, B, C, and D (residual heat removal(RHR)suction isolation valves); by valves Ell-F004 A, B, C, and D (RHR suction bypass isolation valves); and by a closed syster outside containment. Proposed changes to Table 3.7-4 include the addition of valves Ell-F004A, B, C and D.

Valve P21-F420 is being added in place of valve P21-F406. P21-F420 is the correct isolation valve in line with P21-F353. P21-F406 is a capped drain valve.

Valves E21-F019A and B are normally open, fail open valves which are ISI Category "B" valves. (Seal leakage in the closed position is inconsequential for fulfillment of their function.) Thus, these valves do not serve a containment isolation function.

Valves G11-F007A and B and G11-F008A and B are located on a line which once tied into loop B of the Core Spray system. This line has been capped as part of a design modification. Thus, these valves no longer serve a primary containment isolation function or any other function.

Valves E41-F007 and E41-F008 are both located downstream of two leak rate tested PCIVs. These PCIVs, B21-F010B and E41-F006, are presently included in Table 3.7-4.



#### REQUEST TO REVISE PRIMARY CONTAINMENT VALVE LISTING TECHNICAL SPECIFICATIONS BASIS FOR CHANGE REQUEST

Valves E51-F012 and E51-F022 are both located downstream of two leak rate tested PCIVs. These PCIVs, B21-F010A and E51-F013, are presently included in Table 3.7-4.

Valves E11-F017A and E17-F017B are not considered part of the primary containment isolation boundary. Valves E11-F015A and E11-F015B, respectively, and closed system outside containment form the containment isolation boundary for these lines.

Valves E21-F004A and E21-F004B are not considered part of the primary containment isolation boundary. Valves E21-F005A and E11-F005B, respectively, and a closed system outside containment form the containment isolation foundary for these lines.

Valve B21-F020 is an automatic valve, not receiving a containment isolation signal, located downstream of other lines each containing two PCIVs. This valve is located downstream of the tie-in point for four 2-inch lines which come off the Main Steam Lines downstream of the outboard Main Steam Isolation Valves (MSIVs). There are two PCIVs located in each of these 2-inch lines. These PCIVs are B21-F022A, B, C, and D (inboard) and B21-F028A, B, C, and D (outboard). Valve B21-F020 is also located downstream of PCIVs B21-F016 and B21-F019, which are located in a 3-inch drain line that is a tie-in for four 2-inch lines coming off the Main Steam Lines upstream of the inboard MSIVs. Thus, for all potential leakage paths through B21-F020, two other PCIVs are provided to form the containment isolation boundary.

For each of the values listed above, our review has determined, for the reasons given, that the subject value is not a PGIV and should not be subject to Appendix J leak rate test requirements. Implementation of this change will not result in increased probabilities or consequences of analyzed accidents. In each case where deletion of leak rate testing is proposed, other values, or closed systems, meeting all applicable criteria will still perform the required Containment isolation function. No new types of accidents are created. Margins of safety are not reduced, since the testing program will still conform to all applicable criteria.



#### ENCLOSURE 2

## NRC DOCKET 50-321 OPERATING LICENSE DPR-57 EDWIN I. HATCH NUCLEAR PLANT UNIT 1 REQUEST TO REVISE PRIMARY CONTAINMENT VALVE LISTING TECHNICAL SPECIFICATIONS 10 CFR 50.92 EVALUATION

Pursuant to 10 CFR 50.92, Georgia Power Company has evaluated the attached proposed amendment for Plant Hatch Unit 1 and has determined that its adoption would not involve a significant hazards consideration. The basis for this determination is as follows:

#### Proposed Change 1:

This change will modify the title of Table 3.7-1 of the Unit 1 Technical Specifications to clarify the table listings. Specifically, the title would reflect the fact that its listings are for Primary Containment Isolation Valves (PCIVs) that are power operated and automatically initiated.

#### Basis:

This change is consistent with Item (i) of the "Examples of Amendments that are Considered Not Likely to Involve Significant Hazards Considerations" listed on page 14,870 of the <u>Federal Register</u>, April 6, 1983. The proposed editorial change is made to achieve clarification in the Technical Specifications and, therefore, meets the requirements of Item (i) for an amendment involving no significant hazards considerations.

This change does not involve a significant increase in the probability or consequences of an accident, because it is editorial and is intended to add clarity to the Technical Specifications.

The possibility of a different kind of accident from any analyzed previously is not created by this change, because plant design and operation are not affected.

Margins of safety are not significantly reduced by this change, because the plant safety analyses are not affected.

#### Proposed Change 2:

This proposed change would delete a reference to Table 3.7-1 from Technical Specification 3.7.D.1. Specifically this Specification presently requires that "...all primary containment isolation valves listed in Table 3.7-1...shall be operable..." Removal of the reference results in a requirement that all PCIVs (including those not listed in Table 3.7-1) shall be operable.

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#### REQUEST TO REVISE PRIMARY CONTAINMENT VALVE LISTING TECHNICAL SPECIFICATIONS TO CFR 50.92 EVALUATION

### Basis:

This change is consistent with Item (ii) of the "Examples of Amendments that are Considered Not Likely to Involve Significant Hazards Considerations" listed on page 14,870 of the Federal Register, April 6, 1983. This conservative change represents an additional requirement. Therefore, the change meets the requirements of Item (ii) for an amendment involving no significant hazards considerations.

This change does not involve a significant increase the probability or consequences of an accident, because it will add to Tecnnical Specifications requirements.

The possibility of a different kind of accident from any analyzed previously is not created by this change, because plant design and operation are not affected.

Margins of safety are not significantly reduced by this change, because the plant safety analyses are not affected.

#### Proposed Change 3:

This proposed change would delete the check valves listed in the Unit 1 Technical Specifications Table 3.7-1. Table 3.7-1 is for surveillance of automatic PCIVs which receive a primary containment isolation signal, and the inclusion of the presently listed check valves in this table is superfluous.

#### Basis:

This change is consistent with Item (i) of the "Examples of Amendments that are Considered Not Likely to Involve Significant Hazards Considerations" listed on page 14,870 of the Federal Register, April 6, 1983. The proposed editorial change is made to achieve clarification in the Technical Specifications and, therefore, meets the requirements of Item (i) for an amendment involving no significant hazards considerations.

This change does not involve a significant increase in the probability or consequences of an accident, because it is editorial and is intended to add clarity to the Technical Specifications. No automatic actuation, closure time, or any other surveillances are involved for the presently listed check valves, and their appearance in Table 3.7-1 is not necessary.



#### REQUEST TO REVISE PRIMARY CONTAINMENT VALVE LISTING TECHNICAL SPECIFICATIONS TO CFR 50.92 EVALUATION

The possibility of a different kind of accident from any analyzed previously is not created by this change, because plant design and operation are not affected.

Margins of safety are not significantly reduced by this change, because the plant safety analyses are not affected.

#### Proposed Change 4:

This proposed change would add additional valves to the listings in Table 3.7-1.

## Basis:

The valves proposed for inclusion in Table 3.7-1 are added as a result of a comprehensive review of automatic PCIVs performed by GPC with assistance from the Architect/Engineer. Certain of these valves have been added to the plant due to design changes. Our review identified other valves which meet the criteria for inclusion in Table 3.7-1 but have not previously been listed in the table. These valves are now proposed for addition to the table.

This change is consistent with Item (ii) of the "Examples of Amendments that are Considered Not Likely to Involve Significant Hazards Considerations" listed on page 14,870 of the Federal Register, April 6, 1983. The proposed change is conservative, since it adds valves to the table and additional Technical Specifications requirements. No valves are proposed for deletion.

This change does not involve a significant increase in the probability or consequences of an accident, because it is conservative in nature and will result in additional Technical Specifications requirements.

The possibility of a different kind of accident from any analyzed previously is not created by this change, because plant design and operation are not affected.

Margins of safety are not significantly reduced by this change, because the plant safety analyses are not affected.

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#### REQUEST TO REVISE PRIMARY CONTAINMENT VALVE LISTING TECHNICAL SPECIFICATIONS 10 CFR 50.92 EVALUATION

### Proposed Change 5:

This change proposes to correct descriptive information associated with Table 3.7-1. Specifically, these changes would correct inaccuracies in the "normal position" and "action on initiating signal" designations for several valves listed in the table. Additionally, certain signals initiating group isolations are added to the Notes for Table 3.7-1.

#### Basis:

This change does not involve a significant increase in the probability or consequences of an accident, because it will correct Technical Specifications to accurately reflect plant conditions. No changes to PCIV operation or configuration are involved.

The possibility of a different kind of accident from any analyzed previously is not created by this change, because plant design and operation are not affected.

Margins of safety are not significantly reduced by this change, because the plant safety analyses are not affected.

## Proposed Change 6:

This proposed change would modify the Unit 1 Technical Specifications Table 3.7-4, "Primary Containment Testable Isolation Valves." Valve listings and descriptive information for presently listed valves would be changed, as appropriate, to reflect the actual plant design and conditions.

## Basis:

The proposed change corrects inaccurate information. No changes in plant operation are involved with this change.

This change is consistent with Item (i) of the "Examples of Amendments that are Considered Not Likely to Involve Significant Hazards Considerations" listed on page 14,870 of the Federal Register, April 6, 1983. The proposed editorial change corrects errors and adds clarification to the Technical Specifications and, therefore, meets the requirements of Item (i) for an amendment involving no significant hazards considerations.



#### REQUEST TO REVISE PRIMARY CONTAINMENT VALVE LISTING TECHNICAL SPECIFICATIONS TO CFR 50.92 EVALUATION

This change does not involve a significant increase in the probability or consequences of an accident, because it is editorial and is intended to accurately reflect plant conditions in the Technical Specifications.

The possibility of a different kind of accident from any analyzed previously is not created by this change, because plant design and operation will be more clearly reflected in the Technical Specifications.

Margins of safety are not significantly reduced by this change, because the plant safety analyses are not affected.

#### Proposed Change 7:

This proposed change involves modifications to the notes on local leak rate testing of certain PCIVs associated with Table 3.7-4. Applicable testing criteria specified in 10 CFR 50 Appendix J are satisfied by the revised notes.

#### Basis:

These changes will correct previous problems associated with local leak rate testing of certain PCIVs in the direction opposite post accident flow. Because of the configuration of these valves within their respective systems, they could not be pressurized and tested in their isolation direction. Design modifications, including the installation of blocking valves and test connections between the affected valves and the penetration, will now allow these valves to be tested in the isolation direction. Therefore, the Notes to Table 3.7-4 corresponding to these valves have been changed to indicate the method of testing. The revised method of testing meets applicable criteria per 10 CFR 50 Appendix J.

This change does not involve a significant increase in the probability or consequences of an accident, because it will result in Technical Specifications requirements being more consistent with local leak rate testing.

The possibility of a different kind of accident from any analyzed previously is not created by this change, because plant design and operation are not affected.

Margins of safety are not significantly reduced by this change, because the plant safety analyses are not affected.



## REQUEST TO REVISE PRIMARY CONTAINMENT VALVE LISTING TECHNICAL SPECIFICATIONS 10 CFR 50.92 EVALUATION

#### Proposed Change 8:

The proposed change would add 71 valves to Table 3.7-4 of the Unit 1 Technical Specifications.

#### Basis:

The addition of valves to the Technical Specifications is a conservative change enacted after a comprehensive review of leak rate testing requirements. This review has identified a large number of valves currently listed in plant leak rate test procedures which do not appear in Table 3.7-4. In some cases the valves have been added as a result of plant modifications. In other cases the valves have never appeared in the Table even though they are leak rate tested.

Addition of the valves to the Technical Specifications is a conservative change to allow the Technical Specifications to reflect plant leak rate test procedures. This change is consistent with Item (ii) of the "Examples of Amendments that are Considered Not Likely to Involve Significant Hazards Considerations" listed on page 14,870 of the Federal Register, April 6, 1983. The proposed change is conservative, since it adds valves to the table and additional Technical Specifications requirements. No valves are proposed for deletion.

This change does not involve a significant increase in the probability or consequences of an accident, because it is conservative in nature and will result in additional Technical Specifications requirements.

The possibility of a different kind of accident from any analyzed previously is not created by this change, because plant design and operation are not affected.

Margins of safety are not significantly reduced by this change, because the plant safety analyses are not affected.

#### Proposed Change 9:

This proposed change would delete 26 valves from Table 3.7-4. These valves proposed for deletion are as follows:

- a) Are not automatic PCIVs,
- b) Do not receive a primary containment isolation signal,
- c) Are located downstream of two leak rate tested PCIVs or capped lines, or
- d) Are not considered part of the primary isolation boundary.



#### REQUEST TO REVISE PRIMARY CONTAINMENT VALVE LISTING TECHNICAL SPECIFICATIONS 10 CFR 50.92 EVALUATION

Georgia Power Company's comprehensive review of leak rate testing procedures and requirements resulted in the identification of certain valves which should not require leak rate testing. Enclosure 1 details the justification for the deletion of each of the 26 valves from Table 3.7-4.

This change will not involve a significant increase in the probability or consequences of accident; because for each of the 26 valves, our review has determined that the subject valve is not a PCIV which should be subject to the leak rate test requirements of Table 3.7-4.

The possibility of a different kind of accident from any analyzed previously is not created by this change, because plant design and operation are not affected.

Margins of safety are not significantly reduced by this change, because the plant safety analyses are not affected.

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## ENCLOSURE 3

## NRC DOCKET 50-321 OPERATING LICENSE DPR-57 EDWIN I. HATCH NUCLEAR PLANT UNIT 1 REQUEST TO REVISE PRIMARY CONTAINMENT VALVE LISTING TECHNICAL SPECIFICATIONS PROPOSED CHANGE TO TECHNICAL SPECIFICATIONS

The proposed changes to the Technical Specifications (Appendix A to Operating License DPR-57) would be incorporated as follows:

Remove Page	Insert Page
ix	ix
3.7-16	3.7-16
	3.7-16a
3.7-17	3.7-17
3.7-18	3.7-18
	3.7-18a
	3.7-18b
3.7-19	3.7-19
	3.7-19a
3.7-23	3,7-23
3.7-24	3.7-24
3.7-25	3.7-25
3.7-26	3.7-26
	3.7-26a
	3.7-26b
3.7-27	3.7-27

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